

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE NON JUDICIAL CIVIL FORFEITURE :  
PROCEEDING REGARDING \$ 153,731.00, : STIPULATION AND ORDER  
\$300,020 and \$60,000 IN UNITED STATES :  
CURRENCY SEIZED ON OR ABOUT APRIL : \_\_\_\_\_Misc. \_\_\_\_\_  
10, 2020 :  
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WHEREAS, on or about April 10, 2020, the Drug Enforcement Administration (“DEA”) seized (i) \$153,731 in United States currency from inside 144-20 38<sup>th</sup> Avenue Flushing, NY (“Subject Currency-1”); (ii) \$60,000 in United States currency from Ying Yu Yan in front of 144-20 38<sup>th</sup> Avenue, Flushing, NY (“Subject Currency-2”); and (iii) \$300,020 in United States currency from Tai Jing Zhao at the intersection of Bowne Street and Roosevelt Avenue in Flushing, NY (“Subject Currency-3,” collectively, with Subject Currency-1 and Subject Currency-2, the “Seized Currency”);

WHEREAS, on April 20, 2020 the DEA initiated an administrative forfeiture proceeding against the Seized Currency pursuant to Title 21, United States Code, Section 881 by timely sending written notice of its intent to forfeit the Seized Currency to all known interested parties;

WHEREAS, on or about June 17, 2020, the DEA received a claim from Ying Yu Yan asserting an interest in Subject Currency-1;

WHEREAS, on or about June 17, 2020, the DEA received a claim from Li Hua Zhao asserting an interest in Subject Currency-1;

WHEREAS, on or about June 17, 2020, the DEA received a claim from Arrival Enterprises, Inc. asserting an interest in the Seized Currency;

WHEREAS, the DEA subsequently referred the matter to the United States Attorney's Office, Southern District of New York for judicial forfeiture;

WHEREAS, no other party has claimed an interest in the Seized Currency;

WHEREAS, Title 18, United States Code, Section 983(a)(3)(A) provides that, "not later than 90 days after a claim has been filed, the Government shall file a complaint for forfeiture in the manner set forth in the Supplemental Rules for Certain Admiralty and Maritime Claims or return the property pending the filing of a complaint, except that a Court in the district in which the complaint will be filed may extend the period for filing a complaint for good cause shown or upon agreement of the parties;"

WHEREAS, pursuant to Title 18, United States Code, Section 983(a)(3), the United States is required to file a civil complaint to forfeit the Seized Currency no later than September 15, 2020;

WHEREAS, Ying Yu Yan, Li Hua Zhao, and Arrival Enterprises (the "Claimants"), through their counsel, Renee Wong, Esq. have consented to a 60-day extension of the deadline for the Government to file a complaint against the Seized Currency;

WHEREAS, Renee Wong, Esq. attorney for the Claimants, represents and warrants that she is authorized to execute this Stipulation on behalf of her clients, Ying Yu Yan, Li Hua Zhao, and Arrival Enterprises; and

WHEREAS, the Government requests an extension of 60 days to file a complaint from September 15, 2020 to November 16, 2020;

NOW, THEREFORE, IT IS HEREBY ORDERED, upon agreement of the aforementioned parties and pursuant to Title 18, United States Code, Section 983(a)(3)(A), that the time in which the Government is required to file a complaint for forfeiture of the Seized Currency is extended from September 15, 2020, up to and including November 16, 2020.

AGREED AND CONSENTED TO:

AUDREY STRAUSS  
Acting United States Attorney for the  
Southern District of New York

By:   
Brett M. Kalikow  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-2220

9/9/20  
DATE

By: Renee Wong  
Renee Wong, Esq.  
Golderberger and Dubin, P.C.  
Attorney for Claimants  
401 Broadway, Ste. 306  
New York, NY 10007

9/9/20  
DATE

SO ORDERED:

HONORABLE  
UNITED STATES DISTRICT JUDGE

DATE